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2	Acting United States Attorney District of Nevada						
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4							
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8	UNITED STATES DISTRICT COURT DISTRICT OF NEVADA						
9	DISTRICT	A NEVADA					
10	UNITED STATES OF AMERICA,	Case No.: 2:21-cr-00082-GMN-EJY					
11	Plaintiff,	Stipulation for Extension of Time (First Request)					
12	vs.	(First Request)					
	DANIELA TITO AND JACK PAUL						
13	MCLAUGHLIN, Defendants.						
14							
15	IT IS HEREBY STIPULATED AND A	GREED, by and between Christopher Chiou,					
16	United States Attorney, and Andrew W. Duncan, Assistant United States Attorney, counsel for						
17	,	,					
18	the United States of America, Thomas F. Pitaro, counsel for defendant Daniela Tito, and						
19	James Oronoz, counsel for Defendant Jack Paul	l McLaughlin, that the date for the Governmen					
20	to file a response to the Defendant's Motion to S	Suppress (ECF No. 47) be extended for twenty					
21	one days, specifically to April 11, 2022.						
22	This stipulation is entered for the following reasons:						
	1. The Defendant's Motion to Suppr	ress was filed and served on March 7, 2022. See					
23	ECF No. 47. The Government's	response deadline is presently March 21, 2022.					
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1	2.	Government Counsel was out	t of the District and unable to have sufficient time to
2		conduct investigation into the	issues raised in the Motion.
3	3.	Government Counsel needs a	dditional time to conduct investigation and
4		research to adequately respon	d to the Defendant's motion.
5	4.	The parties need additional ti	me to attempt to resolve the matter without
6		litigating pre-trial motions.	
7	5.	The additional time requested	herein is not sought for purposes of delay, but to
8		allow counsel for the Government	ment time to adequately respond to the Defendant's
9		motion.	
10	6.	Additionally, denial of this re-	quest for continuance could result in a miscarriage
11		of justice.	
12	7.	This is the first stipulation file	d herein to continue the Government's response
13		deadline.	
14	8.	The parties agree to the extensi	sion of time.
15	DATED: March 18, 2022		
16	Respectfully submitted,		
17	CHRISTOPHER CHIOU		
18		g United States Attorney	
19		:/ Andrew W. Duncan	/s/ Thomas F. Pitaro
20	ANDREW W. DUNCAN Assistant United States Attorney		THOMAS F. PITARO Counsel for Defendant
21			Daniela Tito
22			<u>/s/_James Oronoz</u> JAMES ORONOZ
23			Counsel for Defendant Jack Paul McLaughlin
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4	UNITED STATES DISTRICT COURT DISTRICT OF NEVADA			
5	***			
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7	UNITED STATES OF AMERICA,) 2:21-cr-00082-GMN-EJY			
8	Plaintiff,)			
9	v.)			
10	DANIELA TITO AND JACK PAUL) MCLAUGHLIN)			
11	Defendants.)			
12)			
13	FINDINGS OF FACT			
14	Based on the pending Stipulation of counsel, and good cause appearing therefore, the			
15	Court finds that:			
16	1. The Defendant's Motion to Suppress was filed and served on March 7, 2022. See			
17	ECF No. 47. The Government's response deadline is presently March 21, 2022.			
18	2. Government Counsel was out of the District and unable to have sufficient time to			
19	conduct investigation into the issues raised in the Motion.			
20	3. Government Counsel needs additional time to conduct investigation and			
21	research to adequately respond to the Defendant's motion.			
22	4. The parties need additional time to attempt to resolve the matter without			
23	litigating pre-trial motions.			
24				

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1	5.	The additional time requested herein is not sought for purposes of delay, but to		
2		allow counsel for the Government time to adequately respond to the Defendant's		
3		motion.		
4	6.	Additionally, denial of this request for continuance could result in a miscarriage		
5		of justice.		
6	7.	This is the first stipulation filed herein to continue the Government's response		
7		deadline.		
8	8.	The parties agree to the extension of time.		
9	For a	Il of the above-stated reasons, the ends of justice would best be served by a		
10	continuance of the Government's response deadline.			
11	CONCLUSIONS OF LAW			
12	The additional time requested herein is not sought for purposes of delay, but to allow th			
13	Government adequate time to respond to the Defendant's motion and to allow the parties to			
14	negotiate a resolution of the case. The failure to grant said continuance would likely result in a			
15	miscarriage	miscarriage of justice.		
16		<u>ORDER</u>		
17	IT IS THEREFORE ORDERED that the previously scheduled response deadline for			
18	the Government to respond to the Defendant's Motion to Suppress is extended until April 11,			
19	2022.			
20	DATED this 18th day of March 2022.			
21		2 . 00		
22		HONORABLE ELAYNAJ, YOUCHAH		
23		HONORABLE BLAYNAJI. YOUCHAH UNITED STATES MAGISTRATE JUDGE		
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